

SHUMWAY VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

SHUMWAY VAN
MICHAEL C. VAN, ESQ.
Nevada Bar No. 3876
BRENT D. HUNTLEY, ESQ.
Nevada Bar No. 12405
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770
Facsimile: (702) 478-7779
Email: michael@shumwayvan.com
brent@shumwayvan.com
Attorneys for Plaintiffs

UNITED STATES FEDERAL COURT
DISTRICT OF NEVADA

MARK EDWARDS DAVIS, LLC and
DREAM CONNECTIONS
INTERNATIONAL, INC.,

Plaintiffs,

vs.

ENGAGE ENTERPRISES, LLC, and OLEG
VYDRA.

Defendants.

Case No.:
Dept. No.:

VERIFIED COMPLAINT AND PETITION FOR INJUNCTIVE RELIEF

Come the Plaintiffs, Mark Edward Davis, LLC and Dream Connections International, Inc., by and through counsel and by verified Complaint by the authorized corporate representative of the Plaintiffs and file this, their Complaint and Verified Petition for Injunctive Relief at the Defendants jointly and severally as follows:

THE PARTIES

1. The Plaintiffs are Nevada corporations with their principle office located at Las Vegas, Nevada.
2. The Defendant, Engage Enterprises, LLC is a Nevada corporation which may be served with process through its registered agent, Marie Acain, 5031 Wagon Trail Avenue, Suite 107, Las Vegas, Nevada 89118.

4. Defendant Olga Reznikova is a citizen of Ukraine and may be served with process at Hlinki 2 Street, Dnepro City, Ukraine 49000.

5. This Court has subject matter jurisdiction over this action by virtue of 17 U.S.C. §501 et seq. based upon the joint and several conspiracy to commit copyright violations and actual copyright violations by the defendants and their ancillary breach of contract and fraud and the agreements of defendants Oleg Vydar and Olga Reznikova to submit to the jurisdiction of this court.

6. That in 2011, the Plaintiffs created “Dream Connections”, which was founded on the belief that multi-national marriages are richly rewarding and can provide a lifetime of joy and satisfaction. That as a result of their creation of a successful system for match-making between multi-national citizens, the Plaintiff have statistically, less than 20% divorce rates and high survey scores for happy relationships. In the creation of the Dream Connections system, the Plaintiffs created a process for meeting and marrying between citizens of different countries through planning and action steps not used by other match-making companies. Through Dream Connections, the Plaintiffs created a system for pre-meeting screening, education and training and natural and fun ways for multi-national citizens to connect personally – face to face – and support them through the system to marriage with the goal of creating successful international marriages.

7. That in 2011, the Plaintiff created, published and copyrighted their system otherwise known and referred to as Dream Connections Quest Romance Tours, which is incorporated in the website www.dreamconnections.com with the following indicator:

| Disclaimer | Affiliates Click Here"

8. That as part of the Dream Connections system, the plaintiffs created an Affiliate

1 program where individuals and entities may execute an Affiliate Agreement contract with the
 2 Plaintiffs to market products produced by the Plaintiffs and to earn commissions based on referrals
 3 of multi-national citizens to the Plaintiffs to become clients of Dream Connections Quest Romance
 4 Tours.

5 9. That as part of the Dream Connections system, the Plaintiffs created "The
 6 Inner Circle" accessible at www.dreamconnections.com/inner-circle, which is a paid
 7 membership program available for registration and payment at www.innercircle.club
 8 creating an online 'family' where you'll be able to learn from other like-minded people who are
 9 striving toward happy, fulfilling relationships with international wives and in which access is
 10 restricted as a members-only site providing services the Inner Circle Social Community and
 11 enrollment in 'TribeTalk' which is a live weekly webinar forum, monthly member newsletters,
 12 members-only interviews, tips and insights, and discounts to Dream Connections conferences and
 13 seminars, online roundtable meetings with Guest Speakers and access to the "Quest Video Vault",
 14 with in excess of 83 hours of previously unpublished videos concerning the Dream Connections
 15 system. That by purchasing a membership to the Inner Circle, members agree to the Terms and
 16 Conditions published at www.innercircle.club as follows:

17 *Terms and Conditions*

18
 19 *Read very carefully:*

20 *THIS SITE IS OPERATED BY MARK EDWARD DAVIS, LLC., AND DREAM CONNECTIONS,*
 21 *INTERNATIONAL, INC. YOU MAY CONTACT US HERE.*

22 *WWW.DREAMCONNECTIONS.COM OFFERS ENTERTAINMENT ON THE TOPIC OF*
 23 *RELATIONSHIPS AND INTERNATIONAL DATING, AS WELL AS PRODUCTS AND*
 24 *SERVICES RELATED TO RELATIONSHIPS AND INTERNATIONAL DATING. ALL CONTENT,*
 25 *PRODUCTS AND SERVICES ARE NOT TO BE CONSIDERED AS LEGAL OR*
 26 *PROFESSIONAL ADVICE, AND ARE TO BE USED FOR PERSONAL ENTERTAINMENT*
 27 *PURPOSES ONLY.*

28 *BY USING THIS SITE, YOU AGREE TO AND ACCEPT THE FOLLOWING TERMS,*
 29 *CONDITIONS, AND NOTICES (WE RESERVE THE RIGHT TO CHANGE, UPDATE, AND*
 30 *REVISE THESE TERMS OF USE AT OUR SOLE DISCRETION. PLEASE CHECK BACK*
 31 *OFTEN TO REVIEW ANY UPDATED TERMS):*

YOU AGREE TO NOT USE THIS SITE FOR ANY UNLAWFUL PURPOSE.

1. CONFIDENTIALITY AND TRADE SECRETS: YOU ACKNOWLEDGE AND AGREE THAT ALL CONTENT AND MATERIALS AVAILABLE ON THIS SITE, INCLUDING BUT NOT LIMITED TO SYSTEMS, DESIGNS, WORDING, COLORS AND GRAPHICS ARE PROPRIETARY TRADE SECRETS PROTECTED BY COPYRIGHTS, TRADEMARKS, SERVICE MARKS, PATENTS, OR OTHER PROPRIETARY RIGHTS AND BY OTHER LAWS AND THAT THEIR USE IS RESTRICTED BY THE TERMS OF THIS AGREEMENT. USE OF THE CONTENT OR MATERIALS ON THIS SITE FOR ANY PURPOSE WITHOUT WRITTEN PERMISSION FROM MARK EDWARD DAVIS, LLC AND DREAM CONNECTIONS, INTERNATIONAL, INC. IS STRICTLY PROHIBITED. YOU FURTHER AGREE THAT YOU WILL CREATE NO DERIVATIVE WORKS OF THIS SITE OR THE PRODUCTS OFFERED WITHIN.

10. That on September 15, 2016, Oleg Vydra submitted a profile form with the Plaintiffs through the www.dreamconnections.com website to be considered as a client for a Dream Connection Quest Romance Tour as follows:

Oleg Vydra

Timestamp 9/14/2016

First and Last Name Oleg Vydra

Middle Name

Your Name/Short Name you would like to be called by?

Date of Birth: mm/dd/yy 1/10/1973

Email Address: oleg@vegasyogalife.com

Other Email Address? oleg.vydra@yahoo.com

Skype Address: Required for Interview!

Cell Phone: 17028859642

Work Phone:

Do you Have Facebook, Myspace, LinkedIn other...? Facebook ...
oleg.vydra@yahoo.com

What Country do you live in? United States

Citizenship: United States

Full Address of your residence 5031 Wagon Trail Ave, Suite 107, , Las Vegas, NV 89118

Trip you are joining? March 2017 - Nikolaev Ukraine

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Time Zone Pacific (USA)

Height: 5'-10"

Weight: 160

Hair Color: Brown

Eye Color: Hazel

Religion: Spiritual / Philosophical

Smoking: No

Drinking: On Occasion

Do you have any special needs No

Do you have any Tattoos? No

Do you have any physical limitations? No

Do you have any pets? No

Marital Status? Single

Previous fiancée visas? No

Did you been in Ukraine, Colombia, or Thailand Before?

Other places you travelled in past 3 years? Mexico, Budapest, Paris, Turks & Caicos

How many languages do you know? 2 (English and Russian)

Any restraining orders? When? No

Mental Illness? No

Do you have kids? No

Number living people at home with you: Zero

Do you want to have more Children with your future Wife? Yes, looking forward to having kids

Your Occupation: Yoga Studio Owner, Entrepreneur, Writer, Philosoph

How long you been working there? 5 Years owning studio

Your work hours? Up to me. Studio open 7 days per week, I have 5 desk staff and 15 instructors working for me.

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Say something about yourself you'd like for her to know. I am a sincere, fun, compassionate person. I enjoy life, I appreciate good company and good people. I like fitness, teach yoga, and own a yoga studio. I am an entrepreneur at heart, but my focus, love, and attention is currently writing a book about the philosophical exploration of the human mind. I love to be in the company of my special woman whom I share everything with. I like to be close, affectionate, smiling, happy...and to enjoy the small things that are given to us by life every day. I enjoy travel, good food, and feeling that life is a journey!

How do you imagine your match? I imagine a beautiful young lady who is also into fitness, nature, hiking, biking, yoga, etc. A lady who has a cheerful and happy personality, who enjoys the company of other people and always helps spread happiness in this world. I hope we can travel, cook, take walks, and enjoy life together.

Age range? 18-30 (maybe 35)

Height range?

Hair color?

If she have Children, what your reaction on that? I don't have children yet, so it would need to be a special connection and circumstance if she already has kids.

Do you plan to move to different country to live? No

How did you hear about Dream Connections? You Tube

11. That as a potential client of the Plaintiffs, Defendant Oleg Vydra submitted his photos and began a series of interviews by the Plaintiffs' administrative director and then, 5 days later, a Skype interview with the Plaintiffs' group tour manager. That during this portion of the Plaintiffs' system, the Defendant made inquiries concerning the interview process for the purposes to accessing proprietary and trade secret information for the purpose of infringing upon the Plaintiffs' copyrighted works in order to copy the Plaintiffs' copyrighted works in the creation of a competing business. That during the interview process, the defendant was not forthright about his ability to speak Russian until confronted about his background. Thereafter, the defendant refused to respond to calls from the Plaintiffs' representatives.

12. That the defendant monitored the Plaintiffs' promotion and operation of Dream Connections established by a digital trail of computer access "clicks" since September 14, 2016

13. That the defendant paid to become a member of the private "Inner Circle Club" by

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membermarkedwarddavis.com wp-admin/admin.php/page-wishlist/members&wmemberid=use 90% C Q Search

[Gmail](#)
[DC](#)
[Infusion](#)
[Youtube](#)
[m3](#)
[Vimeo](#)
[Trello](#)
[Flickr](#)
[eNotes](#)
[Adwords](#)
[FB](#)
[45 Nov 2017](#)
[Trello](#)
[SoundCloud](#)
[Amazon](#)
[ZenDesk](#)
[Opera](#)
[Dropbox](#)
[FAQ](#)

[Mark Feland Davis Members](#)
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[0](#)
[+](#)
[More](#)

[Dashboard](#)
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[Settings](#)
[Members](#)
[Levels](#)
[Content](#)
[Sequential Upgrade](#)
[Integration](#)

[Manage Members](#)
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[WordPress 4.8 is available! Please update now.](#)
[The most current version of WordPress Members is v2.12.3228. Please update now.](#)
[Dismiss](#)

[Members » Manage Members](#)
[Add New](#)

[oleg@olegasyoga.life.com](#)
[All Users](#)
[Q](#)
[Advanced](#)

[- Select an Action -](#)
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[Go](#)
[0](#)

☐ [Show Only Latest Level](#)
[Display 200](#)
[Rows per Page](#)
[Update](#)

<input type="checkbox"/>	Username	Nickname	Email	Subscribed	Posts	Sequential	Registered
<input type="checkbox"/>	Oleg	Olegasyoga	oleg@olegasyoga.life.com	Yes	-	On	12/07/16
	Active - Inner Circle						12/07/16
	Active - Quest Mastermind Workshop						04/29/17

Recent Orders

Date	Link	Payment Plan	Status	Total	Add Order			Remaining Bal
					Paid	Balance		
12/2/16	Order Form	Has A Payment Plan	No Refund Issued	\$100	\$100	\$0.00		\$0.00

Subscriptions

View	Qty	Start Date	Bill Amt	Auto\$	Status	Cycle	Next Bill	Add Subscription	
								Credits	
The Inner Circle Membership	1	12/2/2016	\$29.00	Yes	Active	Month	7/1/2017	0	

Recent Recurring Charges

Date	Order	Payment Plan	Status	InvoiceTotal	Amt Paid	Current Balance	More Invoices	
							RemainingBalance	
6/2/2017	OlegVydra - The Inner Circle Membership	Has A Payment Plan	No Refund Issued	\$29.00	\$0.00	\$29.00	\$29.00	
5/2/2017	OlegVydra - The Inner Circle Membership	Has A Payment Plan	No Refund Issued	\$29.00	\$29.00	\$0.00	\$0.00	
4/2/2017	OlegVydra - The Inner Circle Membership	Has A Payment Plan	No Refund Issued	\$29.00	\$29.00	\$0.00	\$0.00	
3/2/2017	OlegVydra - The Inner Circle Membership	Has A Payment Plan	No Refund Issued	\$29.00	\$29.00	\$0.00	\$0.00	
2/2/2017	OlegVydra - The Inner Circle Membership	Has A Payment Plan	No Refund Issued	\$29.00	\$29.00	\$0.00	\$0.00	
1/2/2017	OlegVydra - The Inner Circle Membership	Has A Payment Plan	No Refund Issued	\$29.00	\$29.00	\$0.00	\$0.00	

14. On January 9, 2017, the internet domain "Intl-Romance.com" was purchased by defendant, Engage Enterprises LLC, a Nevada corporation whose registered agent is Marie Acain. The contact name on the URL registration of "Intl-Romance.com" is Marie Acain. The address for Marie Acain is 5031 Wagon Trail Avenue, Suite 107, Las Vegas, Nevada 89118, which is the same address as a Yoga Studio which is owned and operated by defendant, Oleg Vydra. That address used by the defendants for both Oleg Vydra's Yoga Studio and Intl-Romance.com is published by Google Maps as

- <https://www.google.com/maps/place/5031+Wagon+Trail+Ave+%23107,+Las+Vegas,+NV+89118/@36.0692399,-115.2115369,17z/data=!3m1!4b1!4m5!3m4!1s0x80c8c6142a1801fd:0xde84f0cbf7a9963!8m2!3d36.0692356!4d-115.2093482>

That defendant, Oleg Vydra is personally featured in nearly all of the advertising and promotion YouTube videos contained and published the International Romance website page: <http://www.intl-romance.com/video-gallery/>. That when potential clients register on the International Romance website and joins their email list, the potential client receives a message with defendant Oleg Vydra's name while being re-directed to their site:

<https://www.dropbox.com/s/jlhx32wy5prp82z/Olegs%20connection%20to%20Intl-Romance.com.mp4?dl=0>

1 That defendant, Oleg Vydra's profile page on www.linkedin reveals the following description:
 2 "Yoga Studio Development, Independent Writing, and International Romance-Introduction &
 3 Matchmaking Social Club". That the defendants created International Romance and Adventure
 4 Introduction and Matchmaking Social Club, through the use of digital and internet marketing and
 5 promotion issued the following announcement featuring defendant, Oleg Vydra:



13 Hello Scott

14 Oleg Vydra here with International Romance & Adventure!

15
 16 I would like to personally welcome you to our International USA & Ukraine Dating Social Club. I just
 17 returned from Ukraine and we have been busy preparing for our July, August, and September Romance
 18 Tours in Dnipro, Ukraine.

19 We also had a great calendar Photoshoot with ladies from our Social Club and we'll have more videos
 20 coming out for you soon. You can see two of our welcome videos below ... but be sure to stay connected
 21 and check out all of the videos on our Website and on our YouTube Channel.

22 Don't forget that we are offering a \$500 discount for our 1st Romance Tour from July 28th – Aug
 23 5th and we guarantee no more than 10 clients per tour to make sure you receive our undivided VIP
 24 attention. You will also experience the most luxurious and convenient accommodations compared to
 25 anyone else in the industry today.

26 So come join us, we're going to have a great time...I promise you won't regret it. Our goal is to provide
 27 you with a true experience of Romance & Adventure. We're looking forward to speaking with you soon
 28 and seeing you this Summer in Dnipro, Ukraine!

Summer "Romance" Tour with Ukrainian Ladies



Romance Summer Tour July 28th - Aug 5th Dnipro, Ukraine 2017



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1 15. That defendant. Oleg Vydra accessed nearly every page on the
2 dreamconnections.com website evidenced by a digital trail of contact and access by the defendant
3 including more than 20 minutes on the opened Profile Form page just weeks before the defendants
4 published and otherwise launched the website www.Intl-Romance.com to public access as a direct
5 competitor to the Plaintiffs.

6 16. That the defendants' creation of International Romance business and the
7 publication of the www.Intl-Romance.com website was for the purpose of the creation, promotion
8 and sale of international match-making services and tour events in direct competition with the
9 Plaintiffs by infringing upon the copyrighted works of the Plaintiffs by copying and committing
10 the unauthorized use of the Plaintiffs' trade secrets and proprietary property from the Dream
11 Connections Quest Romance Tours system and the contents of the www.dreamconnections.com
12 website in order to create, promote and operate International Romance and the www.Intl-
13 Romance.com website as follows:

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About Me:		DREAM CONNECTIONS.COM		Them	
First Name *		First Name *			
Middle Name		Middle Name			
Last Name *		Last Name *			
Nickname / Preferred Name		E-mail *			
Primary Email *		Skype ID (Required for Interview) *			
Secondary Email		Mobile Phone *			
Sign ID (Required for interview)		Area Code Phone Number			
Cell Phone *		Time Zone *			
Work Phone		<input type="radio"/> Pacific Time Zone <input type="radio"/> Mountain Time Zone <input type="radio"/> Central Time Zone <input type="radio"/> Eastern Time Zone <input type="radio"/> Other			
Time Zone *					
Please enter your birthday in the following format: MM/DD/YYYY Your Birthday (Please use MM/DD/YYYY format)		Birthday *			
<input type="text"/>		<input type="text"/>			
Do you have Facebook, MySpace, LinkedIn, or other? (Please provide the e-mail address used for Facebook)		Do you have Facebook, LinkedIn, or other? (Please provide the email(s) used for these) *			
<input type="text"/>		<input type="text"/>			
Street Address 1 *		Address *			
Street Address 2		Street Address			
City *		Street Address Line 2			
State *		City		State / Province	
Postal Code *		Please Select		Country	
Please select one		Postal / Zip Code			
Citizenship *		Citizenship *			

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Do you have any history of mental illness? (If yes, are you currently on any medications?) *

Do you have any kids? (How many and age of children?) *

What is your occupation? (Describe in a few words exactly what you do and how long you have been at this profession) *

Number of people living with you at home? (Kids, parents, roommates, others) *

Would you like to have more children with your future wife? *

Your Occupation (Describe in a few words exactly what you do and how long you have been at this profession) *

Do you have any pets? *

Do you have any tattoos? *

DREAM
CONNECTIONS.COM

Them

Do you have any history of mental illness? (If yes, are you currently on any medications?) *

Do you have any kids? (How many and age of children?) *

Number of people living with you at home? (Kids, parents, roommates, others) *

Would you like to have more children with your future wife? *

Your Occupation (Describe in a few words exactly what you do and how long you have been at this profession) *

MATCHING YOU AND HER

Say something about yourself that you'd like your lady to know! Be detailed and describe us your lady can start to have a good understanding of who you are!

Describe the qualities you like in a lady? *

Age Range? *

Height Range? *

Hair Color? (Are you open to different hair colors and styles?) *

How do you feel about meeting a lady that has children? *

Help Guide our Matching Experts

How do you feel about meeting a lady that has children? *

How do you feel about meeting a lady that has children? *

Facebook

Twitter

Instagram

Tumblr

Pinterest

Matching You and Her:

Say something about yourself that you'd like your lady to know!

Describe the qualities you like in a lady? *

Age Range? *

Height Range? *

Hair Color? *

How do you feel about meeting a lady that has children? *

How do you feel about meeting a lady that has children? *

How do you feel about meeting a lady that has children? *

Facebook

Twitter

Instagram

Tumblr

Pinterest

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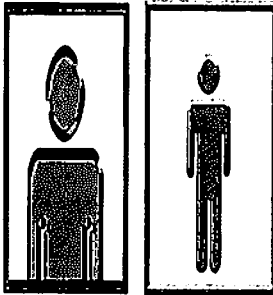
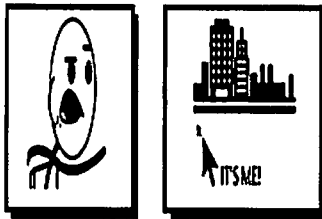
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Please:

Please send your photos and State ID for a support copy via e-mail to john.henry@dreamconnection.com
 1) Copy of your State ID (Driver's License) or Passport (first 7 digits) Please provide a readable copy of photo

2) Set of Photos Pictures**PLEASE DON'T SEND THIS KIND OF PICTURE!****DREAM
CONNECTIONS.COM****Them****DOCUMENTATION AND PHOTOS**

Please provide us with several Current Photos of yourself and a scanned copy of your State ID or Passport via email to support@intl-romance.com

* Please provide clear photos of yourself and your headshot

*Photos and Scanned ID Upload Section Here

Photo *



Scanned ID *

**CONTACT INFORMATION:**

International Romance & Adventure

Web: www.intl-romance.com

Email: support@intl-romance.com

Phone: 1 (702) 885-9542

Please Note:

- All of our information will stay Private.
- We need to know as much as possible about you so we can help create a good match.
- We will not release misleading information about you.
- Please use correct, valid information (i.e. Name, Age, etc.)

Any Questions? Let us Know:

john.henry@dreamconnection.com
 (702) 885-9542 ext 1

Contact Information:

Send all photos and request to john.henry@dreamconnection.com

John Henry (support)
john.henry@dreamconnection.com
 Skype: johnhenry94
 (702) 885-9542 ext 1

Mark Davis
mark.davis@dreamconnection.com
 Skype: TheMarkDavis

Anna Davis
anna.davis@dreamconnection.com
 Skype: TheAnnaDavis

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9-Day Group Quest Romance Tour Schedule

Day 1: Friday

Pick Up at Odessa Airport

2:00 pm Leave for Nikolaev

6:00 pm Meet Your Translator Dinner

Day 2: Saturday

10:00 am Coaching Session

Noon - 3:30 pm Meet & Greet Event 1

Evening for 1 on 1 Dates

Day 3: Sunday

10:00 am Coaching Session

Noon - 3:30 pm Meet & Greet Event 2

Evening for 1 on 1 Dates

Day 4: Monday

Full Day for 1 On 1 Dates 3:00pm Orphanage Visit

9:00pm Karaoke (optional- clients and translators only)

Day 5: Tuesday

Full Day for 1 on 1 Dates

Day 6 Wednesday

Full Day for 1 on 1 Dates

4:00 am - Live Webinar from DC Office

10:00 pm - Storm Nightclub (optional-clients and translators only)

Day 7: Thursday

Full Day for 1 on 1 Dates

10:00 am - Round Table Testimonial on Cafe Porch

Day 8: Friday

Full Day for 1 on 1 Dates

5:00 pm - Finale Dinner Event

Day 9: Saturday

Individual Transportation to Odessa Airport for Departing Flights

Them

General Group Schedule

Day 1 (Friday)

Depending on everyone's arrival time we'll have all the gentlemen gather for a drink and/or light dinner after you have settled in (optional if you feel you would like to rest after your trip). If your plane gets in late, we'll make sure your apartment is stocked with some water/juice/drinks and we'll help you get settled in for a good night's rest.

Day 2 (Meal & Greet)

In the morning we will all gather for a group breakfast, Q & A, discuss schedule for the week, things to do, and have you get to know your translator / assistant / tour guide better.

In the afternoon we will all gather for the Meal & Greet event at the hotel restaurant. This event may last 3-4 hours depending on how many participants we have and that's where you will have the opportunity to meet all of the ladies. The event will be structured as a hybrid of "It's Just Lunch" and "Speed Dating".

All the booths and ladies of the restaurant will have water, juice, snacks, and a glass of Champagne will be offered to the ladies. Approximately 2/3's of the way through the event we will offer a light meal for everyone to re-energize and re-hydrate.

Once this event has been completed for the day (and if you still have enough energy to continue) we can help make arrangements with your first date for that very evening. Your translator/assistant will help you schedule and organize all of the dates with the ladies that you connected with (please keep in mind that some of these ladies have work and other responsibilities, so it is very important to coordinate with each lady according to her schedule & availability).

Day 3-5

You will be going on your scheduled one-on-one dates, discovering the city, a mid-week boogie/horror/hang-out, and if you're interested a day spa for massage, health & relaxation (highly recommended).

Day 6-7

After your individual one-on-one dates, you will see who has become that special girl and you can spend additional time getting to know each other better, seeing the city, restaurants, shows, and many other recreational activities.

Day 8

Photo Dinner Gala Event: This is the final dinner where all the gentlemen invite the ladies that they have chosen, along with all of our translators. We will have an evening of food and celebration to conclude your week-long International Romance & Adventure tour experience.

Day 9

Everyone fly's back to their homeland - unless you have chosen to stay longer, then we can help you extend your apartment and other services. See a translator if you should request it. *Additional fees apply.*

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© We Provide You With Personal Coaching, training, a when you go to Ukraine in search of your life-partner.

© Our special "Meet and Greet" events are designed to abundance of beautiful, eligible ladies in Ukraine. We ways for people to meet, interact, and enjoy getting to Dating like nothing you've seen before!

© At the end of this nine-day adventure tour is our "Fi Night from High School, where everyone brings a speci which creates memories for a lifetime!

is our "Finale Dinner Event" which i gs a special lady they've met from the

le rooms located near the city centers.

Them

Depending on everyone's arrival time we'll have all the get If your plane gets in late, we'll make sure your apartment is

Day 2 (Meet & Greet)

In the morning we will all gather for a group breakfast, Q

In the afternoon we will all gather for the Meet & Greet you will have the opportunity to meet all of the ladies. The

After your individual orientation tour, you will see restaurants, shows, and many other recreational acti

Day 8

Finale Dinner Gala Event: This is the final dinner v celebration to conclude your week-long international

Day 9



9-Day Group Quest Romance Tour Schedule

Day 1: Friday

Pick Up at Odessa Airport

2:00 pm Leave for Nikolayev

6:00pm Meet Your Translator Dinner

Day 2: Saturday

10:00 am Coaching Session

Noon - 3:30 pm Meet & Greet Event 1

Evening for 1 on 1 Dates

Day 3: Sunday

10:00 am Coaching Session

Noon - 3:30 pm Meet & Greet Event 2

Evening for 1 on 1 Dates

Day 4: Monday

Full Day for 1 on 1 Dates 3:00pm Orphanage Visit

9:00pm - Karaoke (optional- clients and translators only)

Day 5: Tuesday

Full Day for 1 on 1 Dates

Day 6 Wednesday

Full Day for 1 on 1 Dates

4:00 am - Live Webinar from DC Office

10:00 pm - Storm Nightclub (optional-clients and translators only)

Day 7: Thursday

Full Day for 1 on 1 Dates

10:00 am - Round Table Testimonial on Cafe Porch

Day 8: Friday

Full Day for 1 on 1 Dates

5:00 pm - Finale Dinner Event

Day 9: Saturday

Individual Transportation to Odessa Airport for Departing Flights

Them

General Group Schedule

Day 1 (Friday)

Depending on everyone's arrival time we'll have all the gentlemen gather for a drink and/or light dinner after you have settled in (optional if you feel you could like to rest after your trip). If your plane gets in late, we'll make sure your apartment is stocked with some water/juice/drinks and we'll help you get settled in for a good night's rest.

Day 2 (Saturday & Greet)

In the morning we will all gather for a group breakfast, Q & A, discuss schedule for the week, things to do, and have you get to know your translator / assistant / tour guide better.

In the afternoon we will all gather for the Meet & Greet event at the local restaurant. This event may take 3-5 hours depending on how many participants we have and that's where you will have the opportunity to meet all of the ladies. The event will be structured as a hybrid of "It's Just Lunch" and "Speed Dating".

All the booths and ladies at the restaurant will have water, juice, fruits, snacks, and a glass of Champagne will be offered to the ladies. Approximately 2/3 of the way through the event we will offer a light meal for everyone to re-energize and re-vitalize.

Once this event has been completed for the day (and if you still have enough energy to continue) we can help make arrangements with your first date for that very evening. Your translator/assistant will help you schedule and organize all of the dates with the ladies that you connected with (please keep in mind that some of these ladies have work and other responsibilities, so it is very important to coordinate with each lady according to her schedule & availability).

Day 3 - 5

You will be going on your scheduled one-on-one dates, site-seeing tours of the city, a mid-week bowling/karaoke hang-out, and if you're interested a day spa for massage, health & relaxation (highly recommended).

Day 6 - 7

After your individual one-on-one dates, you will see who has become that special girl, and you can spend additional time getting to know each other better, seeing the city, restaurants, shows, and many other recreational activities.

Day 8

Photo Dinner Gala Event: This is the final dinner where all the gentlemen invite the ladies that they have chosen, along with all of our translators. We will have an evening of food and celebration to conclude your week-long International Romance & Adventure tour experience.

Day 9

Everyone fly's back to their homeland - unless you have chosen to stay longer, then we can help you extend your apartment and other services. Be a translator if you should request it. ***Additional fees apply.**

SHUMWAY VAN

8985 South Eastern Avenue, Suite 100

Las Vegas, Nevada 89123

Telephone: (702) 478-7770 Facsimile: (702) 478-7779

17. That a comparison of the Plaintiffs' system and contents of www.dreamconnections.com and the defendants system and contents of www.Intl-romance.com reveal the following side-by-side comparisons of tour feature bullet points from DreamConnections.com (DC) and Intl-Romance.com (IR) "Romance Tour" pages: <http://www.intl-romance.com/romance-tours/> - <http://www.DreamConnections.com/romance-tour>

- DC: *Assign You a Personal Assistant / Translator while you are in Ukraine. She will be your translator, date coordinator, as well as your friend and advocate. Your translator will be your shield and guide and B.S. detector.*
- IR: *A Personal Translator/Assistant/Tour-Guide for the Entire Duration of Your Trip.*
- DC: *Hand You Your Own Personal In-Country Cell Phone pre-programmed with your translator's number and your guide's local number. You'll take this phone home with you so you can use it again when you come back to spend more time with others you meet on the tour.*
- IR: *Use of Local Cell Phone with Pre-Programmed Numbers, Prepaid Minutes and Internet Access.*
- DC: *Hotel with Breakfast and WiFi. Comfortable rooms located near the city centers. Start every day by hanging out with the guys for breakfast, if you chose. Keep in touch back home through the internet and Skype calls (ask us how).*
- RI: *First Morning Breakfast Event with the Entire Group Including All Translators.*
- DC: *Our special "Meet and Greet" events are designed to eliminate every barrier and help you connect with an abundance of beautiful, eligible ladies in Ukraine. Whether you are shy or outgoing, we create comfortable ways for people to meet, interact, and enjoy getting to know each other. This is a comfortable form of Speed-Dating like nothing you've seen before!*
- IR: *Social Event at a Local Restaurant With 30-40+ Ladies as a Unique Mix of "It's Just Lunch" and "Speed Dating." All Water, Juice, Champagne, Fruits and Food will be Provided for all Gentlemen, all Invited Ladies and all Translators.*

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- 1 • DC: *At the end of this nine-day adventure tour is our "Finale Dinner Event", which is*
- 2 *much like your Prom Night from High School, where everyone brings a special lady*
- 3 *they've met from their week to an elegant dinner which creates memories for a lifetime!*
- 4 • IR: Dinner Gala Event Finale – for all Gentlemen, their Chosen Ladies, and all
- 5 Translators.
- 6 • DC: *Support You After You've Found Her through the visa process and adjustments*
- 7 *to life at your home. We will connect you with visa attorneys and more to help you*
- 8 *succeed with the woman of your dreams.*
- 9 • IR: *We will Support you through the K-1 Visa Process after the Tour Ends and we'll*
- 10 *Connect You with a Visa Attorney.*

11 That YouTube videos and promotional materials produced and published by the Plaintiff as part
 12 of their system and www.dreamconnections.com include specific use of trade names in which the
 13 Plaintiffs refer to the dating events as "*Meet & Greet*" events and the concluding event during the
 14 Dream Connections Quest Romance Tour referred to as the "*Finale Dinner*" event. That the
 15 defendants copied the trade names on: <http://www.intl-romance.com/romance-tours/> in which they
 16 specifically refer to their events as "*Meet & Greet*" events and "*Finale Dinner Gala*" event.

17 18. That by infringing upon the copyrighted works of the Plaintiffs, the defendants have
 18 created, marketed and promoted International Romance and Adventure as a competing entity of
 19 the Plaintiffs and are securing clients for a travel tour beginning July 28, 2017 - August 5, 2017
 20 for which the defendants are received payments of up to Four Thousand and 00/100 Dollars
 21 (\$4,000.00) per clients.

22 19. That the defendants jointly and severally have and are infringing on the copyrighted
 23 works of the Plaintiffs in violation of 17 U.S.C. §501. That the defendants acts of past, present and
 24 future infringement of the copyrighted works of the Plaintiffs are willful and intentional and that the
 25 plaintiffs are entitled to damages as set forth is 17 U.S.C. §504 et seq as a matter of law.

26 20. That the defendants' acts of past, present and future infringement on the copyrighted
 27 works of the Plaintiffs in violation of 17 U.S.C. §501 are causing irreparable injury, harm and damage
 28 to the Plaintiffs entitling the Plaintiffs to immediate injunctive relief in the form of a Temporary

SHUMWAY VAN

8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123

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1 Restraining Order and Temporary Injunction to prohibit the defendants from further promotion,
2 marketing and operation of International Romance and Adventure, their website, www.Intl-
3 romance.com and the use of social media including but not limited to YouTube and Instagram.

4 21. That the defendant, Oleg Vydra, individually and as a joint enterprise with Engage
5 Enterprises, LLC are guilty of breach of contract in that through the unlawful actions of defendant,
6 Oleg Vydra, he violated the Terms and Conditions of his membership with the Plaintiffs in order to
7 infringe upon the copyrighted works, trade secrets, trade names and other proprietary property of the
8 Plaintiffs in order to act with Engage Enterprises, LLC in the creation, marketing, promotion and
9 operation of International Romance and Adventure as a competing international match-making and
10 travel website, system and romance tour service all for which the defendants are liable to the Plaintiffs,
11 as a matter of law.

12 22. That the defendants' breach of contract in the creation, promotion and operation of a
13 competing international dating website has and is causing irreparable injury, harm and damage to the
14 Plaintiffs entitling the Plaintiffs to immediate injunctive relief in the form of a Temporary Restraining
15 Order and Temporary Injunction to prohibit the defendants from further promotion, marketing and
16 operation of International Romance and their website, www.Intl-romance.com and the use of social
17 media including but not limited to YouTube and Instagram.

18 **WHEREFORE**, the Plaintiffs pray as follows:

19 a. That the defendants be required to answer the Complaint according to law;

20 b. That pursuant to Rule 65 of the *Federal Rules of Civil Procedure*, a Temporary
21 Restraining Order be issued by this Court and served upon the defendants restraining it from
22 advertising, promoting, marketing and operating International Romance and www.Intl-
23 romance.com including but not limited to the use of all social internet media and the operation of
24 romance tour events as referred to on the website;

25 c. That a hearing be set and the defendants be required to appear and show cause as to
26 why the restraining order should not continue as a temporary injunction under Rule 65 of the *Federal*
27 *Rules of Civil Procedure*;

28

1 d. That upon the trial of this matter, a Judgment be entered against the defendants jointly
2 and severally in an amount not to exceed \$1,500,000.00 and that a Permanent Injunction be issued by
3 the Court and served upon the defendants prohibiting them from advertising, promoting, marketing
4 and operating International Romance and www.Intl-romance.com including but not limited to the
5 use of all social internet media and the operation of romance tour events as referred to on the
6 website;

7 e. That the costs of this cause be taxed against the defendants pursuant to a bill of costs.

8 SHUMWAY VAN

9 

10 Michael C. Van, Esq., #3876
11 Brent D. Huntley, Esq., #12405
12 8985 S. Eastern Ave., Suite 100
13 Las Vegas, Nevada 89123
14 *Attorneys for Plaintiffs*

SHUMWAY VAN

8985 South Eastern Avenue, Suite 100

Las Vegas, Nevada 89123

Telephone: (702) 478-7770 Facsimile: (702) 478-7779

SWORN VERIFICATION

**MARK EDWARD DAVIS, LLC AND DREAM CONNECTIONS
INTERNATIONAL, INC.**

BY: _____

Mark Edward Davis, President

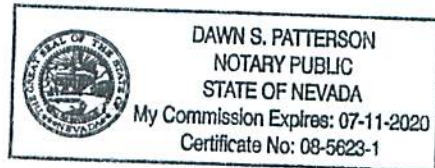
STATE OF NEVADA

COUNTY OF CLARK

Mark Edward Davis, after being duly sworn according to law, makes oath and says as follows: that the statements contained in the foregoing Verified Complaint and Petition for Injunctive Relief are true to the best of his knowledge, information and belief, that said Complaint and Petition are not made out of levity or by collusion, but in sincerity and truth for all the causes mentioned therein.

Sworn to and subscribed before me this
____ day of _____, 2017.

Notary Public



My Commission Expires: 7/11/2020

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